

David Garrett

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Matt Blunt, Governor • Doyle Childers, Director

www.dnr.mo.gov

March 22, 2005

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RETURN RECEIPT REQUESTED

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Mr. Thomas S. Sanicola
Modine Manufacturing Company
1500 DeKoven Avenue
Racine, WI 53403-2552

RE: Comprehensive Groundwater Monitoring Evaluation (CME) Report, Modine
Manufacturing Company, Camdenton, Missouri

Dear Mr. Sanicola:

A CME concerning the groundwater monitoring program at the Modine Manufacturing Company in Camdenton, Missouri, has been prepared by the Missouri Department of Natural Resources' Hazardous Waste Program (HWP). A copy of this report is enclosed.

The report evaluates the field measurements of water quality; piezometric measurement technique; purging, measurement and sampling techniques; the facility Sampling and Analysis Plan (SAP); well and equipment maintenance; split sample comparisons; sample quality control and preservation; and Annual Groundwater Report content. This CME also evaluates the placement of groundwater monitoring wells in comparison to the conceptual model of flow for the site. The criteria for evaluation is whether the wells yield samples representative of conditions within the aquifer and whether they are sited to best determine contaminant transport.

The CME report reveals that overall the sampling protocol at the Modine facility is sufficient to yield representative results and the groundwater monitoring wells are in sound condition. However, the CME raised several issues that must be addressed by Modine. The majority of the CME Report issues are self-explanatory and are discussed in detail in the report. However, there are two areas which require additional discussion. These are:

- ♦ Potential soil contamination source area beneath the manufacturing building in the area of the former Monorail Vapor Degreaser; and



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- ♦ Potential soil contamination along the domestic wastewater sewer line that discharged facility wastewater to the former Hulett Lagoon.

Sample results during investigation of the Monorail Vapor Degreaser in May 1997 indicated that hazardous waste and/or hazardous constituents remained in the soil and water that was found in the subgrade beneath and adjacent to the building. The monorail vapor degreaser has been removed from the facility since this investigation. However, conclusions and recommendations in the Monorail Vapor Degreaser Letter Report stated: "Based upon these results it appears that if any soil impact is present it must be located directly beneath the concrete containment trough". Therefore, Dames & Moore (Modine's consultants prior to CH2MHill) recommends that, "Geoprobe® sampling be conducted within the confines of the trough." To date, additional soil sampling has not been conducted in this area. Based on this statement and the soil sample results in the letter report, additional soil investigation beneath the manufacturing building is necessary to determine if soil beneath the building remains a potential source to groundwater contamination in the area.

There is a potential for soil contamination along the domestic wastewater sewer line that discharged facility wastewater to the former Hulett Lagoon. The department recommends that soil samples be collected along the former sewer line from the edge of Modine's property to the former lagoon to determine if the former sewer line remains a potential source to groundwater contamination. Modine and Hamilton Sundstrand have cited access issues as a reason for not collecting soil samples along the sewer line. Modine is obligated per Section XI of the Order to use "Best Efforts" to obtain access to property not owned or controlled by Modine where work (investigation and/or remediation) may be required by the department. In the event that Modine uses "Best Efforts" and an access agreement is not obtained, the Department may assist Modine in obtaining access. In the event that the Department obtains access, Modine shall undertake department-approved work on such property.

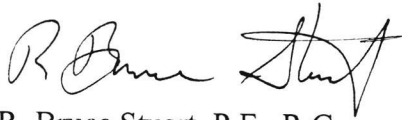
These remaining areas must be investigated to fully characterize the source of groundwater contamination in the area surrounding Modine and the former Hulett Lagoon. These activities are necessary to satisfy the requirements of this CME and as further steps in the corrective action process. Modine must address the issues contained in the CME within 30 days of receipt of this letter.

Mr. Thomas S. Sanicola
March 22, 2005
Page 3

If you have any questions, please do not hesitate to contact Christine Kump-Mitchell, P.E., of my staff at the Missouri Department of Natural Resources, HWP, P.O. Box 176, Jefferson City, MO 65102-0176, or by phone at (314) 416-2960.

Sincerely,

HAZARDOUS WASTE PROGRAM

A handwritten signature in black ink, appearing to read "R. Bruce Stuart". The signature is stylized with a large, looped "R" and a long, sweeping "S" that extends to the right.

R. Bruce Stuart, P.E., R.G.
Chief, Groundwater Unit
Permits Section

RBS:ckms

Enclosure

c: Mr. William A. Spratlin, United States Environmental Protection Agency, Region VII
Mr. David Garrett, United States Environmental Protection Agency, Region VII

